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12 IN THE UNITED STATES DISTRICT COURT
13 DISTRICT OF ARIZONA

14 United States of America,
15
16 Plaintiff,
17
18 vs.
19
20 Stuart Andrew Newell,
21
22 Defendant

Case No. CR-22-01128-PHX-DLR
**MOTION TO CONTINUE TRIAL
AND MOTION TO EXTEND
PRETRIAL MOTION DEADLINE**
(First request)
(Defendant in custody)

23 Defendant, through undersigned counsel, respectfully requests that
24 this Court extend both the September 30, 2022 pretrial motion deadline, and the
25 trial date of November 1, 2022, by sixty (60) days.

26 Counsel has received only limited discovery in this matter, and
27 additional time is therefore necessary for defense counsel to review the discovery,
28 investigate the case, engage in plea negotiations, prepare for trial, and otherwise
render effective assistance of counsel to the defendant.

Defense counsel has contacted Assistant United States Attorney
Brandon Brown regarding this motion and the government has no objection to the
requested continuances.

1 Excludable delay under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv) may
2 result from this motion or from an order based thereon.

3 Respectfully submitted: September 30, 2022.

4 JON M. SANDS
5 Federal Public Defender

6 s/Mark Rumold
7 MARK RUMOLD
8 Asst. Federal Public Defender
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